

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Estates for; Tacitus Hall et al. Richmond Division
 "Marion F. Hall, Wade Mitchell Askew & Clarence Howard"
 Hall/Ceiling; Askew/Jones; Askew/Lovejoy, Hicks/
 Hall/Askew; Howard/Jones: T.A. Hall/Counsel

Case No.

3:22 cv 457

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
 If the names of all the plaintiffs cannot fit in the space above,
 please write "see attached" in the space and attach an additional
 page with the full list of names.)

Jury Trial: (check one)

☐ Yes☒ No

-v-

VEPCO/VA Electric Power Company, Mex/U-Haul
 JCC; DMV/Dept of Motor Vehicles & Great Deal Towing
 City of Richmond, Counties of Henrico, Prince George
 Surrey, Sussex, Better Housing Coalition, Lebanon Village
 AAA, Ford, Chevrolet, etc. Defendant(s)
 (Write the full name of each defendant who is being sued. If the
 names of all the defendants cannot fit in the space above, please
 write "see attached" in the space and attach an additional page
 with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Address

Tacitus Hall et al / T A Hall; Counsel
400 South Pine Street
Richmond VA 23220
City State Zip Code

County

Telephone Number

E-Mail Address

804-234-6440
tacitushall@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

SCC's VEPCO documents lists attached
VEPCO aka VA Electric Power Company dba

Name

Job or Title (if known)

Address

Dominion Power &/or Dominion Energy
Electric Power Systems in Virginia
120 Tredegar Street / 600 East Canal Street
Richmond VA 23219
City State Zip Code

County

Telephone Number

E-Mail Address (if known)

Spring Grove, VA 23881 / Lebanon Village 2#36

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

DMV & Richmond, VA Central/Eastern VA areas
Dept. of Motor Vehicles & City of Richmond
2200 West Broad St Henric, County
Richmond VA 23269
City State Zip Code

County

Telephone Number

E-Mail Address (if known)

804-497-7100
iftdvrp@dmv.gov.com

☐ Individual capacity ☒ Official capacity

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Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

WANA & Great Deals Towing/Box 6065
 Gas & Food Stores 804-349-3972; RVA 23222
 1300 North Laburnum @ Crichton Rd
 Richmond/Henrico line VA 23223
 City State Zip Code

Henrico

804-225-8304

☐ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

VCU / U-Haul OptoPharma; Griffiths
 College; Storage Units, Medical Services
 900 North Lombardy Street
 Richmond VA 23220
 City State Zip Code

804-358-4978

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Property Violations, Fraud/adhesion contracts upon 1910 Rose Ave/23222
 Robotic Signature Fraud upon 905 Irby Drive/23225 after unsuccessful
 Non-judicial Auction; Colonel Clarence J. Howard; Rightful Mortgage Owner.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

for 1 VEPCO at least Six Felony Charges / Federal Criminal Actions against Natural Person T. A. Hall while Living within Lincoln Manor facilities.

for 2 HUD Commissioner engaged Robotic Signature to denize 905 Irby Drive under Assistant Rightful Owner; Kevin Howard.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

2. 905 Irby Drive Robotic Fraud Signature engaged same day as unsuccessful non-judicial auction. Please allow more time to render clarity for exact dates.

1. VEPCO's six federal felonies upon defendant Titus Hall occurred on or about July 2-5 at Lincoln Manor Apartment 2017 or 2018. Please allow more time to research exact date(s)? Hall was hospitalized also.

- B. What date and approximate time did the events giving rise to your claim(s) occur? please view

State Corporation Commission Case # PUE-2011-0008 / 2 pages contain document numbers and dates filed, for VEPCO six felony convictions.

Please allow Hall more time to acquire WANA & Great Deeds Tarring Actions / Auctions?

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?) Must acquire VEPCO transcripts!!

for VEPCO claims; institutions maybe quite difficult to access information without court order. Please allow more time to render what is needed beyond existing requirements and mandates.

For U-Haul/VCU attachments can be provided within next 10 days.

Nevertheless VCU allegations exceed their U-Haul partner's doings along with other state institutions violations.

Please allow more time to present these multiple major clarities?

Hall La

IV. Injuries ; vast an ongoing via property confiscations and rights violations
If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Several major injuries to include McGuire Woods federal charges; must be investigated for accuracy. Willing diligence will engage within next 72 hours of this postal service delivery. As much is quite voluminous.

Ongoing adhesion contracted practices continue

V. Relief ; Equitable Relief Sought;

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

at least \$3,000,000 each for VEPCO felonies falsely engaged.
at least \$500,000 for each day falsely institutionalized via
false accusations within State Maximum Security Facility
"Central State."

Cost of confiscated vehicles over time varies. More time
needed for accuracy.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: August 8, 2022

Signature of Plaintiff Hall Jr

Printed Name of Plaintiff

1910 Rose Dr 23222
Tawitux Hall / Marion F. Hall & Nannie A. Hall

B. For Attorneys

Date of signing: _____

Kevin Howard / Colonel Clarence I. Howard
905 1rby Dr. & Mary Jones 905 1rby Dr
Property. 23225

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

State

Zip Code

Telephone Number _____

E-mail Address _____